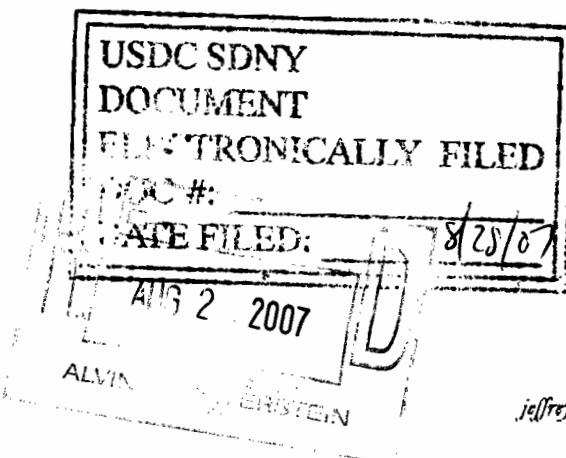




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August 22, 2007

**BY FACSIMILE**

Hon. Alvin K. Hellerstein  
United States District Judge  
United States District Court for  
the Southern District of New York  
500 Pearl Street, Room 1050  
New York, NY 10007

Time to respond  
is enlarged to  
September 28, 2007.

**LAURA TAYLOR SWAIN U.S.D.J.**  
**PART I**

**Re: Weeks Marine, Inc., individually and on behalf of a class v. Bridgestone Corporation, Bridgestone Industrial Products America, Inc.**  
**Case No. 07 Civ 6811**

Dear Judge Hellerstein:

This firm has been retained as local counsel to represent defendant Bridgestone Industrial Products America, Inc. ("BIPA") in the above referenced matter. Primary counsel for BIPA is the law offices of Hal Hardin, located in Nashville, Tennessee.<sup>1</sup> We write this letter to request a thirty (30) day extension of time to answer or otherwise move against the Complaint in the above referenced matter.

The Summons and Complaint in this matter were served on BIPA on August 6, 2007, and BIPA's time to respond currently expires on Monday, August 27, 2007. We seek an extension of time to respond to the Complaint to September 28, 2007. The Complaint purports to seek class action status, is 23 pages long and contains 80 numbered paragraphs. Moreover, this firm was retained only last week and only received the Summons and Complaint in this action this past Monday, August 20, 2007.

On August 21, 2007, Mr. Hardin sent a letter to Robert Eisler, Esq. of Cohen, Milstein, Hausfeld & Toll, attorneys for the plaintiff, to request an extension of time to respond to the Complaint. The letter followed a phone message left for Mr. Eisler last week. Mr.

<sup>1</sup> We intend to file a notice of appearance and serve motions to admit Mr. Hardin and his colleague Harold R. Donnelly, Esq. *pro hac vice* within the next few days.



*Hon. Alvin K. Hellerstein.  
United States District Judge  
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8/22/2007*

Hardin spoke with Mr. Eisler earlier today in connection with the request. Mr. Eisler denied the request, refusing to grant any extension.

There will be absolutely no prejudice to the plaintiff should this extension be granted. In fact, it is our understanding that, to date, only four of the seventeen defendants identified in the caption in this action have been served with the Summons and Complaint. This is the first extension requested in this action.

Thank you for your consideration of this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jeffrey A. Kimmel'.

JAK/ljt

cc: Robert Eisler, Esq. (by fax)  
Steven O. Sidener, Esq. (by fax)  
Hal Hardin, Esq. (by fax)